

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
(WESTERN DIVISION)

IN RE: PROCTER & GAMBLE COMPANY
SHAREHOLDERS LITIGATION

) Civil Action No. C-1-00-190
) (Weber, S.J.)
)
)

**UNOPPOSED MOTION REGARDING
REDISTRIBUTION OF NET SETTLEMENT FUND**

Plaintiffs, by and through counsel, hereby move the Court, pursuant to the Stipulation of Settlement and the Plan of Allocation (collectively the "Settlement"), which was approved by the Court as fair, reasonable and adequate on December 20, 2001, for the entry of an Order approving the redistribution of the balance of the Net Settlement Funds ("Settlement Fund") to: (i) Class Members who have cashed their checks in the initial distribution; (ii) to individuals who have filed late claims; and (iii) individuals who timely filed claims that were deficient and have since provided information to satisfy deficiencies in their claims (collectively referred to as the "redistribution").

In accordance with the Distribution Order entered by the Court on November 22, 2002, the Net Settlement Fund was distributed to class members who filed claims that were approved by the Claims Administrator. On May 29, 2003, approximately six months after the initial distribution, the Claims Administrator sent to Class Members who have not cashed the checks they were sent representing their portion of the Settlement Fund a Final Notification to Cash Check ("Final Notice"). A copy of which is attached hereto as Exhibit "A." In the Final Notice Class Members were advised that they had until July 15, 2003 to cash their settlement check and

if they did not cash their check by that date their portion of the Settlement Fund would be redistributed to class members who have filed a proof of claim and cashed their settlement check.

The Affidavit of Shandarese Garr, Assistant Vice President for Securities Operations of The Garden City Group, the Claims Administrator, a copy of which are attached hereto as Exhibits "B," describes the status of the distribution of the Net Settlement Fund and the details of the proposed redistribution.

Consistent with the Settlement, Plaintiffs respectfully request that the Court enter an Order (i) authorizing the Claims Administrator to stop reissuing checks related to the initial distribution as of August 22, 2003; and (ii) approving the proposed redistribution of the balance of the Net Settlement Fund to late filed claims, resubmitted claims and class members who have received and cashed the checks they received representing their initial distribution of the Net Settlement Fund. A schedule of the proposed redistribution is attached to the Garr Affidavit as Exhibit "A". Since the Claims Administrator has the current addresses of the class members who will receive a check in this distribution, they will advise the Class Members to cash their checks within ninety (90) days after the check is distributed. After the ninety (90) days has expired and before the end of this calendar year, counsel for the parties will submit to the Court a request for approval to distribute the balance of the Net Settlement Fund to a charity or an educational organization(s).

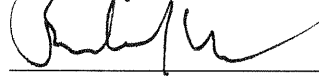
Also, attached to this Motion is a [Proposed] Order Authorizing Redistribution of Settlement Fund for the Court's convenience. A copy is attached hereto as Exhibit "C."

Defendant's counsel has reviewed this filing and has no objection to the entry of the Proposed Order. Attached as Exhibit "D" is a letter from Defendants' counsel indicating that they do not have any objection to the proposed redistribution.

Dated: September 2, 2003

Respectfully submitted,

STRAUSS & TROY



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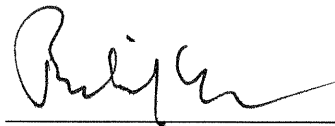
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion Regarding Re-Distribution of Net Settlement Fund was served by ordinary United States mail, first class postage prepaid, upon the following counsel this 2nd day of September, 2003:

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